

OSBORN LAW P.C.

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May 18, 2023

VIA ECF

Honorable Valerie Figueredo
United States District Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: 5-19-2023

The parties proposed amended briefing deadlines contained herein are adopted. The Clerk of Court is directed to terminate the motion at ECF No. 17. **SO ORDERED.**

Re: *Wallace v. Commissioner of Social Security*
Civil Action No. 1:22-cv-09573-VEC-VF

Dear Judge Figueredo,

We write on behalf of plaintiff, Iesha M S Wallace, and with the consent of the defendant, to request a 60-day extension of time to serve plaintiff's motion for judgment on the pleadings as per the November 15, 2022 Scheduling Order. Plaintiff's motion for judgment on the pleadings is due on May 20, 2023. Plaintiff respectfully requests an extension of time up to and including July 19, 2023. This is plaintiff's first request for an extension. The reason for the request is that our office has an unusually large backlog of briefs that are due in the next several weeks, including that of Ms. Wallace.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- a. Plaintiff served a written proposal for settlement on counsel for the Commissioner on **March 22, 2023**;
- b. The Parties filed a joint letter stating that they intend to proceed to briefing on their respective positions on **April 20, 2023**;
- c. The Defendant filed the e-CAR on **February 21, 2023**;

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- d. Plaintiff to file her motion for judgment on the pleadings on or before **July 19, 2023**;
- e. Defendant to file its response/cross-motion on or before **September 18, 2023**;
and
- f. Plaintiff to file her reply (if any) on or before **October 9, 2023**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

Daniel A. Osborn

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cc: Fergus John Kaiser, Esq. (by ECF)